[Submitting counsel below] 2 3 4 5 6 7 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 8 SAN FRANCISCO DIVISION 9 IN RE: UBER TECHNOLOGIES, INC., MDL No. 3084 CRB PASSENGER SEXUAL ASSAULT 10 LITIGATION [PROPOSED] ORDER APPROVING 11 ESTABLISHMENT OF MDL 3084 UBER RIDESHARE COMMON BENEFIT 12 This Document Relates to: **QUALIFIED SETTLEMENT FUND AND** 13 APPOINTING FUND ADMINISTRATOR ALL CASES 14 Honorable Charles R. Breyer 15 16 Upon the Motion of the Court-appointed MDL 3084 Plaintiffs' Co-Lead Counsel, and for good 17 18 cause shown, the Court hereby orders as follows: 19 1. Establishment of the MDL 3084 Uber Rideshare Common Benefit Qualified Settlement 20 Fund (the "Fund") is hereby approved, and the Court retains exclusive continuing jurisdiction thereof. 21 The Fund shall be operated in a manner consistent with the rules of Treasury Regulation Section 1.468B-22 1. The Fund shall remain open to receive payment(s) from the Defendant in resolution and full and final 23 satisfaction of one or more contested claims of alleged tort or violation of law that have resulted or may 24 25 result from injuries or damages sustained by Claimants. 26 2. The Court further appoints ARCHER Systems, LLC, as the Fund Administrator (the "Fund 27 Administrator"), pursuant to the terms, conditions, indemnifications, and restrictions described in the 28 [PROPOSED] ORDER APPROVING MOTION TO ESTABLISH MDL 3084 UBER RIDESHARE COMMON BENEFIT

QUALIFIED SETTLEMENT FUND AND APPOINT FUND ADMINISTRATOR

accompanying Motion and the Qualified Settlement Fund Agreement. The Fund Administrator is granted the authority to conduct any and all activities necessary to administer the Fund, in accordance with the accompanying Motion and the Qualified Settlement Fund Agreement.

- 3. The Fund shall be held at Goldman Sachs Bank USA (the "Custodian"). The Custodian shall be responsible for any and all investment-related decisions, pursuant to the terms and conditions described in the accompanying Motion and the Qualified Settlement Fund Agreement.
- 4. The Fund Administrator is authorized to effect qualified assignments of any resulting structured settlement liability or similar vehicle within the meaning of Section 130(c) of the Internal Revenue Code to the qualified assignee and to distribute all settlement sums pursuant to the accompanying Motion filed with this Court.
- 5. The United States District Court, Northern District of California, shall have exclusive continuing jurisdiction over the Fund pursuant to Treas. Reg. § 1.468B-1(c)(1).
- 6. The United States District Court, Northern District of California, shall be the sole venue by operation of law for any and all disputes which may arise related to the Fund, the Fund's administration, any disbursements and/or payments therefrom, and any disputes relating to fees (including but not limited to attorneys' fees).
- 7. The Fund Administrator is authorized upon final distribution of all monies paid into the Fund, to take appropriate steps to wind down the Fund and thereafter discharge the Fund Administrator from any further responsibility with respect to the Fund. The Fund Administrator may, but shall not be obligated to, seek a final order of discharge from this Court.

SIGNED this $_$	day of	, 2025
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Honorable Judge Charles Breyer